IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA ALBANY DIVISION

)
K.A., a minor, by and through her next)
friend and guardian, Lisa Adams, et al.,) CIVIL ACTION NO.:
individually and as representatives	1:17-cv-00099-LJA
of a proposed class,)
)
Plaintiffs,)
v.)
)
JEFF HOBBY, Sheriff of Worth)
County, Georgia, in his individual)
capacity, et al.,)
)
Defendants.)
	.)

JOINT MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR FILING MEMORANDUM OF LAW IN SUPPORT OF JOINT MOTION FOR CONDITIONAL CERTIFCATION OF SETTLEMENT CLASS

The parties respectfully request leave to exceed the page limits provided in Local Rule 7.4, and file a Memorandum of Law in Support of the Joint Motion for Conditional Certification of Settlement Class up to forty-five pages in length. In support of this motion, the parties state as follows:

1. On November 17, 2017, the parties filed a notice to inform the Court that they reached a proposed class settlement of Plaintiffs' claims in this case, and that they intended to submit to the Court a joint motion for preliminary approval of this settlement by December 4, 2017, and to request a stay of all

proceedings pending the submission and adjudication of their joint motion for preliminary approval. (Doc. 37.)

- 2. The Court granted the parties' stay. (Doc. 38.)
- 3. To adequately demonstrate why the parties' settlement should be given preliminary approval, including an explanation of the terms of the Settlement Agreement that would conclude a case involving a settlement class of approximately 810 students and eighteen Defendants; a discussion of why a settlement Class should be certified; and a detailed explanation of the notification to the Class of approximately 810 students, the parties require a memorandum of law up to forty-five pages in length. Under the Local Rules, a memorandum of law in support of a motion may not exceed twenty pages in length.

CONCLUSION

The Court should grant the parties leave to file a Memorandum of Law in Support of the Joint Motion for Conditional Certification of Settlement Class up to forty-five pages in length.

Respectfully submitted this 30th day of November, 2017.

/s/ Crystal Redd
Sarah Geraghty
Ga. Bar No. 291393
Gerald Weber
Ga. Bar No. 744878

Crystal Redd Ga. Bar No. 969002 Aaron Littman Ga. Bar No. 843053 SOUTHERN CENTER FOR HUMAN RIGHTS 83 Poplar Street, NW Atlanta, Georgia 30303 (404) 688-1202 (404) 688-9440 (fax) credd@schr.org

/s/ Mark Begnaud

Mark Begnaud
Ga. Bar No. 217641
Nathanael Horsley
Ga. Bar No. 367832
HORSLEY BEGNAUD LLC
750 Hammond Drive
Building 12, Suite 300
Atlanta, Georgia 30328
(770) 765-5559
(404) 602-0018 (fax)
mbegnaud@gacivilrights.com

Counsel for Plaintiffs

/s/ Raleigh W. Rollins

Raleigh W. Rollins Ga. Bar No. 613860 ALEXANDER & VANN, LLP 411 Gordon Avenue Thomasville, GA 31792 (229) 226-2565 (229) 228-0444 (fax) rrollins@alexandervann.com

/s/ Richard K. Strickland

Richard K. Strickland

Ga. Bar No. 687830 BROWN, READDICK, BUMGARTNER, CARTER, STRICKLAND & WATKINS, LLP 5 Glynn Avenue (31520) Post Office Box 220 Brunswick, GA 31521 (912) 264-8544 (912) 264-9667 (fax) rstrickland@brbcsw.com

Counsel for Defendants